

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.,

Defendant.

No. 6:20-cv-00815-ADA

**JURY TRIAL DEMANDED**

**BRAZOS’S NOTICE OF FILING OF PETITION FOR  
INTER PARTES REVIEW OF U.S. PATENT NO. 7,596,140**

Pursuant to the Court’s Order Governing Proceedings – Patent Case (Dkt. 26), plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”), hereby provides the Court with notice that a petition for *inter partes* review (“IPR”) of the patent asserted in this case — U.S. Patent No. 7,596,140 (“the ’140 patent”) — has been filed:

**IPR2021-00538**

|   |   |
|---|---|
| Petitioner:                               | Juniper Networks, Inc. (“Juniper”)<br>(the defendant in this case)                    |
| Other Real Parties-in-Interest:           | none  |
| filing date:                              | February 12, 2021<br>(notice of filing date accorded not yet issued)                  |
| expected time for institution decision:   | within 6 months of notification of filing date,<br><i>i.e.</i> , by about August 2021 |
| expected time for final written decision: | within 1 year of institution, <i>i.e.</i> , by about August 2022                      |

The claim construction hearing in this case is scheduled for June 3, 2021 and trial has been scheduled to begin on July 11, 2022. *See* Case No. 6:20-cv-00812, Dkt. 38.

Juniper has filed an opposed motion to transfer this case to the Northern District of California, Dkt. 18, relating to which the parties are conducting discovery pursuant to the Court’s

Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases. Juniper has also filed an opposed motion to stay the proceedings of this case pending the resolution of its motion to transfer, Dkt. 32. *See also* Dkt. 34 (Brazos's opposition to Juniper's motion to stay); Dkt. 35 (Juniper's reply in support of motion to stay).

Respectfully submitted,

Dated: February 18, 2021

/s/ **DRAFT**

---

Raymond W. Mort, III  
Texas State Bar No. 00791308  
raymort@austinlaw.com  
THE MORT LAW FIRM, PLLC  
100 Congress Avenue, Suite 2000  
Austin, Texas 78701  
tel/fax: (512) 677-6825

David M. Stein  
Texas State Bar No. 797494  
dstein@brownrudnick.com  
Sarah G. Hartman  
California State Bar No. 281751  
shartman@brownrudnick.com  
BROWN RUDNICK LLP  
2211 Michelson Drive, 7<sup>th</sup> Floor  
Irvine, California 92612  
telephone: (949) 752-7100  
facsimile: (949) 252-1514

Edward J. Naughton  
(admitted *pro hac vice*)  
enaughton@brownrudnick.com  
Rebecca MacDowell Lecaroz  
(admitted *pro hac vice*)  
rlecaroz@brownrudnick.com  
BROWN RUDNICK LLP  
One Financial Center  
Boston, Massachusetts 02111  
telephone: (617) 856-8200  
facsimile: (617) 856-8201

Alessandra C. Messing  
(admitted *pro hac vice*)  
amessing@brownrudnick.com  
Timothy J. Rousseau

(admitted *pro hac vice*)  
trousseau@brownrudnick.com  
Yarelyn Mena  
(admitted *pro hac vice*)  
ymena@brownrudnick.com  
BROWN RUDNICK LLP  
7 Times Square  
New York, New York 10036  
telephone: (212) 209-4800  
facsimile: (212) 209-4801

*Counsel for Plaintiff*  
*WSOU Investments, LLC d/b/a*  
*Brazos Licensing and Development*